EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA at Charleston

THE WEST VIRGINIA COALITION : AGAINST DOMESTIC VIOLENCE, INC., :

Plaintiff,

v. : Case No. 2:19-cv-00434

(Judge John T. Copenhaver, Jr.)

:

PATRICK J. MORRISEY, in his official capacity as Attorney General for the State of West Virginia

:

Defendant.

PROPOSED STIPULATED PROTECTIVE ORDER

Upon agreement and consent by and between the parties, and upon a finding that good cause exists to protect certain information from public disclosure pursuant to Fed. R. Civ. P. 26(c), it is **HEREBY ORDERED** that:

- 1. The parties shall not disclose the identity of any individual shelter, its location or the identity of shelter employees referenced in any public filings in this case;
- 2. In any public filing, the parties shall use mutually-agreed-upon pseudonyms to identify any licensed domestic-violence program or program employee whose name would identify the program to which information concerning the specific security policies and procedures, and physical security measures employed by each member program pertains.
- 3. If any party wishes to file a document that contains information concerning the specific security policies and procedures, and physical security measures employed by each member program, identifies a shelter by name or location, or identifies a shelter employee, such party will move to file such document with the identifying information redacted.

4. The proponent of continued confidentiality will have the burden of persuasion that the document or material should be withheld from the public record in accordance with (a) Local Rule of Civil Procedure 26.4, (b) the Administrative Procedures for Electronic Filing in the Southern District of West Virginia § 12, and (c) controlling precedent.

ENTER:

Parties and Counsel

COUNSEL FOR PATRICK J. MORRISEY, in his official capacity as Attorney General for the State of West Virginia

PATRICK MORRISEY ATTORNEY GENERAL

s/ Steven A. Travis

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s/ J. David Fenwick

J. David Fenwick (W. Va. Bar No. 6029) Lucas R. White (W. Va. Bar No. 12501)

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